VOLUME II

NO. _____

IN THE SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1983

VIRGINIA CRAMER,

Petitioner, Plaintiff and Appellant

VS

STATE BAR OF MICHIGAN;
JOHN D. O'HAIR;
WILLIAM LEO CAHALAN;
RICHARD D. KUHN;
H. ROLLIN ALLEN, and All
Members of the State Bar
of Michigan similarly
situated,

Respondents, Defendants and Appellees

PETITION FOR A WRIT OF CERTIORARI
TO THE COURT OF APPEALS
SIXTH CIRCUIT - (No. 82-1855)
AND
DISTRICT COURT, ED MICHIGAN
SOUTHERN DIVISION - (No. 81-73926)
AND

REQUEST FOR JURY TRIAL, MONETARY DAMAGES,
INJUNCTIVE, AND DECLARATORY RELIEF

Virginia Cramer
Pro se Petitioner
27314 Clairview
Dearborn Heights,
Michigan 48127
(313) 278-7286

February 1984

VOLUME II

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VOLUME II

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EXHIBIT A - attached to and referred to in Petitioner's "Complaint" - See, Petitioner's Appendix.

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

THE STATE BAR OF MICHIGAN
A Public Body Corporate,

Plaintiff,

-vs-

HAROLD GRAHAM, MICHAEL GORDON, VIRGINIA CRAMER, Individually and d/b/a Gordon-Graham & Cramer Associates,

Defendants.

Civil Action No. 72-218-571-CZ

ISSUED Jan. 5, 1973

JUDGMENT FOR PLAINTIFF AND INJUNCTIVE ORDER

At a session of said Court held in the City-County Building, Detroit, Michigan on JANUARY 5, 1973

PRESENT: HONORABLE JOHN D. O'HAIR
Circuit Court Judge

This matter having come on to be heard upon the plaintiff's complaint for an Order to Show Cause against the defendants requiring them to Show Cause why they should not be punished for their contemptuous conduct of

practicing law illegally and for temporary restraining Order and permanent injunction restraining and enjoining them from practicing law, the defendants having filed answers to the complaint and the Court having heard the testimony and considered the evidence presented in open Court, the Court having heard the arguments of counsel and considered their respective briefs, and the Court being fully advised in the premises:

NOW THEREFORE,

THE COURT DOES ADJUDGE that there are no genuine issues of fact for adjudication in these proceedings and final judgment in this cause be and the same is hereby entered, as follows:

IT IS HEREBY ADJUDGED that said defendants, individually and d/b/a Gordon-Graham & Cramer Associates be and they are hereby permanently restrained and enjoined from the unauthorized practice of law and more specifically they are hereby permanently enjoined from:

(1) Holding themselves out to the public as qualified to render advice and service to

persons interested in obtaining a divorce in the courts of Michigan;

(2) Rendering counsel and service to persons seeking to dissolve a marital relationship by obtaining a judgment of divorce in the courts of the State of Michigan; and,

(3) Furnishing or offering to furnish kits, forms or documents with assistance in their completion or execution, to persons seeking to dissolve a marital relationship by obtaining a judgment of divorce in the courts of the State of Michigan.

IT IS FURTHER ADJUDGED that said individual defendants shall immediately notify, in writing, all customers, patrons or clients of said individual defendants and of Gordon-Graham & Cramer Associates, whose divorce cases are still being processed, that further action by said defendants has been permanently enjoined by the Wayne County Circuit Court;

IT IS FURTHER ADJUDGED that said defendants, Harold Graham, Michael Gordon and Virginia Cramer individually and d/b/a Gordon-Graham & Cramer Associates shall forthwith

refund to the aforesaid customers, patrons or clients, monies heretofore paid to individual defendants and to Gordon-Graham & Cramer Associates by their customers, patrons or clients;

IT IS FURTHER ADJUDGED that the actions of said defendants, Harold Graham, Michael Gordon and Virginia Cramer individually and d/b/a Gordon-Graham & Cramer Associates constitute the unauthorized practice of law in violation of the provisions of MCLA 600.916 and said defendants are hereby adjudged to be guilty of contempt of the Wayne County Circuit Court.

IT IS FURTHER ADJUDGED that the Court expressly reserves jurisdiction to perform all acts leading towards or necessary for the enforcement of this Judgment and Injunctive Order and that the Court withholds imposition of penalties for contempt of Court as found herein, unless necessary to obtain defendants' immediate, full and good faith compliance with the provisions of this judgment.

Entered 1/5/73 /s/ JOHN D. O'HAIR
Circuit Court Judge

EXHIBIT AA

SESSION OF THE SUPREME COURT OF THE STATE OF MICHIGAN, Held at the Supreme Court Room, in the City of Lansing, on the 30th day of December in the year of our Lord one thousand nine hundred and seventy-six.

THE STATE BAR OF MICHIGAN,

Plaintiff-appellee,

v 56413

VIRGINIA CRAMER,
Defendant-Appellant.

Present the Honorable THOMAS GILES KAVANAGH, Chief Justice
G. MENNEN WILLIAMS
CHARLES L. LEVIN
MARY S. COLEMAN
JOHN W. FITZGERALD
LAWRENCE B. LINDEMER
JAMES L. RYAN,
Associate Justices

This cause having been brought to this Court by appeal from the decision of the Court of Appeals and having been argued by counsel and deliberation had thereon by the Court, IT IS HEREBY ORDERED that the judgment of the Court of Appeals is AFFIRMED IN PART and REVERSED IN PART As follows:

The injunctive order of the Circuit Court for the County of Wayne dated January 5, 1973 and the findings of contempt on April 23,1973 are AFFIRMED. The convictions of contempt of December 19, 1973 and October 15, 1974 are

REVERSED.

STATE OF MICHIGAN - ss.

I, Harold Hoag, Clerk of the Supreme Court of the State of Michigan, do hereby certify that the foregoing is a true and correct copy of an order entered in said court in said cause; that I have compared the same with the original, and that it is a true transcript therefrom, and the whole of said original order.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of said supreme court at Lansing, this 20th day of January in the year of our Lord one thousand nine hundred and seventy-seven.

/s/ Corbin R. Davis, Deputy Clerk.

Entered: Jan. 20, 1977
Filed: Jan. 20, 1977

NOTE: See companion case, State Bar v. Cramer 399 Mich 116-161, holding only that,

"To the extent that the defendant (Cramer) provides personal advice peculiar to the dissolution of a specific marriage, she is engaged in the unauthorized practice of law." (emphasis added)

EXHIBIT AAA

State Bar v Cramer - Wayne County Circuit Court, Civil Action No. 72-218-571-CZ, "Cramer" alone appealed.

Michigan Court of Appeals, Docket No.'s 21921, 19075 and 16168 (effecting Wayne County Circuit Court # 72-218-571-CZ (Judge John D. O'Hair) transmitted to the Michigan Supreme Court, June 5, 1975.

State case docket entries involved:

December 30, 1976, Docket No. 56413, State Bar v Cramer, reported at: 399 Mich 116-161.

1-20-77 See companion case, State Bar v Cramer, 399 Mich 116-161 and see Exhibit AA Order and Remittitur of discontinuance, Docket No. 56413. NOT REMANDED to any other jurisdiction.

2-17-81 Exhibit AA-1, Ex parte motion for order to show cause, initiated by State Bar of Michigan and H. Rollin Allen, in Wayne County Circuit Court, filed 2-19-81, No. 72-218-571-CZ.

2-17-81 Exhibit AA-2, Ex parte order to show cause, initiated by State Bar of

Michigan, issued by Judge O'Hair. Not served upon "Cramer". # 72-218-571-CZ.

3-13-81 Exhibit AA-3, Ex parte motion for order to show cause, initiated by State Bar of Michigan and H. Rollin Allen, in Wayne County Circuit Court, filed 3-13-81, No. 72-218-571-CZ.

3-13-81 Exhibit AA-4, Ex parte order to show cause initiated by State Bar of Michigan, issued by Judge William Leo Cahalan for before Judge O'Hair, Wayne County Circuit Court, #72-218-571-CZ.

4-29-81 Bench Warrant, Exhibit AA-6, issued by Judge O'Hair, #72-218-571-CZ, for "Cramer's" arrest for "failure to voluntarily appear".

6-5-81 Exhibit AA-7, Order for Bond $1,000, issued by Judge O'Hair, #72-218-571-CZ.

6-12-81 See APPENDIX T, Transcript of 6/5/81 and APPENDIX U, Transcript of 6/12/81 Wayne County Circuit Court #72-218-571-CZ, Judge O'Hair. "Cramer" arrested and forcibly brought before Judge O'Hair for "failure to voluntarily appear".

6-12-81 "Cramer" deposited $1,000. cash with Wayne County Sheriff's Dept., for her release pending date set by Judge O'Hair as June 17, 1981.

6-12-81 "Cramer" not released after posting $1,000. cash "bond", and instead jailed in the Wayne County Jail to await the arrival of the Oakland County Sheriff's deputies who later transported "Cramer" to the Oakland County Jail in Pontiac, Michigan.

6-12-81 "Cramer" arrested and jailed on two (2) bench warrants issued by Judge Kuhn (Oakland County Circuit Court) divorce cases #74-114-277-DO and #75-121-954-DO. "Cramer" "failed to voluntarily appear". (See, docket entries of Seaholm v Seaholm and Horn v Horn, Oakland County Circuit Court, EXHIBIT B-2, infra.)

6-15-81 "Cramer" released by Oakland County Sheriff's Dept. at rear of Oakland County Jail, approximately 3 P.M.

6-17-81 See conditions of "Bond" EXHIBIT AA-7 and Transcript of June 12, 1981, APPENDIX U for restitution of $1,000. cash "bond" to "Cramer". No restitution made.

7-13-81 Special and Limited Appearance In Propria Persona, Notice of Hearing for July 17, 1981, Motion, Brief in Support of Motion to Quash Service and to Dismiss, filed. See, EXHIBIT B-1 et seq.

7-17-81 Judge O'Hair refused to hear "Cramer's" motion, and sent her a letter denying her motion.

8-11-81 $1,000.00 "cash bond" deposited by "Cramer" on June 12, 1981, refunded to "Cramer".

EXHIBIT AA-1

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY
OF WAYNE

THE STATE BAR OF MICHIGAN, A Public Body Corporate,
Plaintiff

Civil Action

72-218-571-CZ

-vs-

VIRGINIA CRAMER,
Defendant.

FILED
Feb.19,1981

(Ex Parte) MOTION FOR ENTRY OF AN ORDER TO SHOW CAUSE

Now comes the State Bar of Michigan, a Public Body Corporate, by H. Rollin Allen, its Attorney, and files this Motion for the Entry of an Order to Show Cause why Defendant, Virginia Cramer, should not be held in contempt, and says as follows:

1. A Judgment and Injunctive Order was entered by this Honorable Court on the 5th day of January, 1973, enjoining and restraining Defendant, Virginia Cramer, from the further unauthorized practice of law.

2. Upon information and belief, Affiant believes that Virginia Cramer has violated the provisions of the Injunctive Order.

3. On file with the Court, are transcripts of proceedings in the circuit courts of the State of Michigan which indicate that the Defendant, Virginia Cramer is continuing to render legal advice and continuing to become involved in misconduct contrary to the provisions of the Injunctive Order.

WHEREFORE, it is prayed that an Order to Show Cause be entered directing Defendant Virginia Cramer to appear and show cause why she should not be held in civil or criminal contempt for violating the Injunctive Order of this Court.

THE STATE BAR OF MICHIGAN, a Public Body Corporate,
Plaintiff
By: /s/ H. Rollin Allen
(P-10113)
KIEFER, ALLEN AND CAVANAGH
Attorneys for Plaintiff

FILED:
2/19/81

EXHIBIT AA-2

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY
OF WAYNE

THE STATE BAR OF MICHIGAN, A Public Body Corporate, Plaintiff,	Civil Action 72-218-571-CZ
-vs-	
VIRGINIA CRAMER, Defendant.	ISSUED Feb.17, 1981

(Ex Parte) ORDER TO SHOW CAUSE

At a session of said Court held in the City-County Building in the City of Detroit, Wayne County, Michigan, on FEBRUARY 17, 1981

PRESENT: HONORABLE JOHN D. O'HAIR
Circuit Judge

Upon and reading and filing a Motion for the Entry of an Order to Show Cause filed herein,

IT IS ORDERED that VIRGINIA CRAMER appear before this Court at 1413 City-County Building, in the City of Detroit, County of Wayne, State of Michigan on the 13th day of March 1981 at 2:00 O'clock in the afternoon, and show cause why she should not be punished for contempt for violating the Judgment and Injunctive Order heretofore entered in

this matter on January 5, 1973, and more specifically: continuing to hold herself out to the public as qualified to render advice and service to persons interested in obtaining a divorce in the Courts of Michigan; continuing to render counsel and service to persons seeking to dissolve a marital relationship by obtaining a Judgment of Divorce in the Courts of the State of Michigan; and continuing to furnish kits, forms and documents with assistance in their completion and execution to persons seeking to dissolve a marital relationship by obtaining a Judgment of Divorce in the Courts of the State of Michigan.

/s/ John D. O'Hair
Circuit Judge

Entered

2/17/81

EXHIBIT AA-3

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

THE STATE BAR OF MICHIGAN, a Public Body Corporate,
Plaintiff,
-vs-
VIRGINIA CRAMER,
Defendant.
/

Civil Action
72-218-571-CZ

FILED
Mar.13, 1981

(Ex Parte) MOTION FOR ENTRY OF AN ORDER TO SHOW CAUSE

Now comes the State Bar of Michigan, a Public Body Corporate, by H. Rollin Allen, its Attorney, and files this Motion for the Entry of an Order to Show Cause why Defendant, Virginia Cramer, should not be held in contempt, and says as follows:

1. A Judgment and Injunctive Order was entered by this Honorable Court on the 5th day of January, 1973, enjoining and restraining Defendant, Virginia Cramer, from the further unauthorized practice of law.

2. Upon information and belief, Affiant believes that Virginia Cramer has violated the provisions of the Injunctive Order.

3. On file with the Court are transcripts of proceedings in the Circuit Courts of the State of Michigan which indicate that the Defendant, Virginia Cramer, is continuing to render legal advice and tontinuing to become involved in misconduct contrary to the provisions of the Injunctive Order.

4. An Order to Show Cause was entered on February 17, 1981, directing Defendant to appear on March 13, 1981, at 2:00 P.M. This Order and the Motion were delivered to the Wayne County Sheriff for service but service was not effected. Petitioner requests that another Order to Show Cause be issued.

WHEREFORE, it is prayed that an Order to Show Cause be entered directing Defendant, Virginia Cramer, to appear and show cause why she should not be held in contempt for violating the Injunctive Order of this Court.

THE STATE BAR OF MICHIGAN
Plaintiff,

By: /s/ H. ROLLIN ALLEN
(P-10113)

FILED:
3/13/81

EXHIBIT AA-4

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY
OF WAYNE

THE STATE BAR OF MICHIGAN,
A Public Body Corporate,
Plaintiff,

-vs-

VIRGINIA CRAMER,
Defendant.
_____/

Civil Action

72-218-571-CZ

JOHN D. O'HAIR
FILED
Mar. 13, 1981

(Ex Parte) ORDER TO SHOW CAUSE

At a session of said Court held in the City-County Building in the City of Detroit, Wayne County, Michigan on March 13, 1981

PRESENT: HONORABLE WILLIAM LEO CAHALAN
Circuit Judge

Upon the reading and filing a Motion for the Entry of an Order to Show Cause filed herein,

IT IS ORDERED that VIRGINIA CRAMER appear before this Court before Honorable John D. O'Hair at 1821 City-County Building, in the City of Detroit, County of Wayne, State of Michigan, on the 24 day of April 1981, at 2:00 O'clock in the afternoon, and show cause why she should not be punished for contempt for violating the Judgment and

Injunctive Order heretofore entered in this matter on January 5, 1973, and more specifically: continuing to hold herself out to the public as qualified to render advice and service to persons interested in obtaining a divorce in the Courts of Michigan; continuing to render counsel and service to persons seeking to dissolve a marital relationship by obtaining a Judgment of Divorce in the Courts of the State of Michigan; and continuing to furnish kits, forms and documents with assistance in their completion and execution to persons seeking to dissolve a marital relationship by obtaining a Judgment of Divorce in the Courts of the State of Michigan.

/s/ WILLIAM LEO CAHALAN

Circuit Judge

Entered

3/13/81

EXHIBIT AA-5

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY
OF WAYNE

THE STATE BAR OF MICHIGAN, a Public Body Corporate,
Plaintiff,
-vs-
VIRGINIA CRAMER,
Defendant.

Civil Action
72-218-571-CZ
FILED
Mar.13, 1981

(Ex Parte) ORDER TO SHOW CAUSE

At a session of said Court held in the City-County Building in the City of Detroit, Wayne County, Michigan on March. 13, 1981

PRESENT: HONORABLE JOHN D. O'HAIR
Circuit Judge

Upon the reading and filing a Motion for the Entry of an Order to Show Cause filed herein,

IT IS ORDERED that VIRGINIA CRAMER appear before this Court, HON. JOHN D. O'HAIR at 1821 City-County Building, in the City of Detroit, County of Wayne, State of Michigan, on the 24 day of April 1981, at 2:00 o'clock in the afternoon, and show cause why she should not be punished for contempt for violating the Judgment and Injunctive Order hereto-

fore entered in this matter on January 5, 1973, and more specifically: tontinuing to hold herself out to the public as qualified to render advice and service to persons interested in obtaining a divorce in the Courts of Michigan; continuing to render counsel and service to persons seeking to dissolve a marital relationship by obtaining a Judgment of Divorce in the Courts of the State of Michigan; and continuing to furnish kits, forms and documents with assistance in their completion and execution to persons seeking to dissolve a marital relationship by obtaining a Judgment of Divorce in the Courts of the State of Michigan.

/stamped with rubber stamp/

JOHN D. O'HAIR, CIRUIT JUDGE

A TRUE COPY

JAMES R. KILLEEN, CLERK

By /s/ Richard G. Horn
Deputy Clerk

Entered M[illegible] 13, 1981

EXHIBIT AA-6

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY
OF WAYNE

STATE BAR OF MICHIGAN, a Public Body Corporate, Plaintiff, -vs- VIRGINIA CRAMER, Defendant.

CIVIL ACTION

72-218-571-CZ

FILED

APR.29, 1981

H. ROLLIN ALLEN (P-10113)
KIEFER, ALLEN AND CAVANAGH
Attorney for Plaintiff
1565 City National Bank Bldg.
Detroit, Michigan 48226
(313) 961-8080

W A R R A N T

IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN

TO THE SHERIFF OR DEPUTY SHERIFF OF THE COUNTY OF WAYNE:

WE COMMAND you to arrest VIRGINIA CRAMER and bring her forthwith personally before the Wayne County Circuit Court, Honorable John D. O'Hair, to answer to the Court for contempt in not obeying an Order to Show Cause issued out of this Court on the 13th day of March, 1981, and duly served upon her, commanding

her to appear on the 24th day of April, 1981 at the City of Detroit, Room 1821 City County Building, and to testify and to give into evidence in this cause to be tried between the State Bar of Michigan, a Public Body Corporate, Plaintiff, and Virginia Cramer, Defendant, on the part of the State Bar of Michigan.

YOU ARE FURTHER COMMANDED to detain VIRGINIA CRAMER in your custody until she shall be discharged by the Wayne County Circuit Court.

/s/ John D. O'Hair
CIRCUIT JUDGE

Dated: Detroit, Michigan

Apr 29 1981, at 12:05 P.M.

EXHIBIT AA-7

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY
OF WAYNE

STATE BAR OF MICHIGAN,
a Public Body Corporate,
Plaintiff,

CIVIL ACTION

72-218-571-CZ

-vs-

VIRGINIA CRAMER,
Defendant.
/

FILED

June 5, 1981

ORDER FOR BOND

At a session of said Court held in the City-County Building, City of Detroit, County of Wayne, Michigan on JUNE 5, 1981

PRESENT: JOHN D. O'HAIR

This matter having come on for hearing before the Wayne County Circuit Court, Honorable John D. O'Hair, presiding, and the Court being advised in the premises and an outstanding warrant having issued against Virginia Cramer to bring her forthwith before the Wayne County Circuit Court,

NOW THEREFORE IT IS ORDERED that Virginia Cramer be permitted to post a $1,000.00 bond following her arrest and that said bond be posted at the Wayne County Jail, 525 Clinton,

Detroit, Mich 48226 conditioned upon her appearing in Court on the first full day that this Court is in session.

/s/ John D. O'Hair

CIRCUIT COURT

EXHIBIT B-1

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

THE STATE BAR OF MICHIGAN, A Public Body Corporate, and Judge John D. O'Hair, Judge William Leo Cahalan, H. Rollin Allen, members of the State Bar of Michigan, et al, Plaintiffs,	CIVIL ACTION 72-218-571-CZ NO JURISDICTION IN WAYNE COUNTY CIRCUIT COURT

VS

VIRGINIA CRAMER (no case pending in Wayne County Circuit Court No. 72-218-571-CZ without a remand by the Michigan Supreme Court)

FILED 7/13/81

H. ROLLIN ALLEN (p-10113)
Attorney for Plaintiffs

VIRGINIA CRAMER, In Propria Persona
(no case pending (Wayne) No. 72-218-571-CZ)

(continued next page)

SPECIAL AND LIMITED APPEARANCE
IN PROPRIA PERSONA

TO THE COURT CLERK:

PLEASE TAKE NOTICE that special and limited appearance of Virginia Cramer, IN PROPRIA PERSONA, is herewith filed in Civil Action No. 72-218-571-CZ; that the Wayne County Circuit Court lacks jurisdiction in said action 72-218-571-CZ, lacks jurisdiction of said person and/or property of Virginia Cramer, In Propria Persona; that the said Virginia Cramer is not a party to this sham proceedings initiated by the State Bar of Michigan, H. Rollin Allen and Judge John D. O'Hair; that the Wayne County Circuit Court lacks jurisdiction of the subject-matter where, after the decision and opinion by the Michigan Supreme Court (Docket No. 56413), reported at 399 Mich 116, without a remand the lower court has no jurisdiction; that the said Judge John D. O'Hair has robbed Virginia Cramer of her personal property of One Thousand ($1,000.00) Dollard and which is not a bond where the Wayne County Circuit Court has

no jurisdiction in Civil Action No. 72-218-571-CZ.

Short Jurat /s/ Virginia Cramer
Dated:
July 13, 1981 In Propria Persona

TO THE PLAINTIFFS:

PLEASE TAKE NOTICE that Virginia Cramer, In Propria Persona, has filed the above "SPECIAL AND LIMITED APPEARANCE" and that you are required to furnish and/or provide the said Virginia Cramer with a copy of any and/or all papers occurring for whatever purpose in this matter. Also, you are required to notify the said Virginia Cramer, in advance, of any and/or all ex parte communications which have occurred, which may occur or which will occur relative, remotely or otherwise, the reasons and the results therefore, and where the Judge involved, directly and/or indirectly, is a member of the party-plaintiff The State Bar of Michigan.

Dated: /s/ Virginia Cramer
July 13, 1981 In Pro Per

Retroactive to and
including Dec. 31, 1976

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY
OF WAYNE

THE STATE BAR OF MICHIGAN, A Public Body Corporate, and Judge John D. O'Hair, Judge William Leo Cahalan, H. Rollin Allen, Members of the State Bar of Michigan, et al, Plaintiffs	CIVIL ACTION 72-218-571-CZ NO JURISDICTION IN WAYNE COUNTY CIRCUIT COURT
VS	
VIRGINIA CRAMER (no case pending in Wayne County Circuit Court No. 72-218-571-CZ; without a remand by the Michigan Supreme Court)	FILED 7/13/81

NOTICE OF HEARING

TO THE ABOVE-NAMED PLAINTIFFS:

and Attorney for Plaintiffs, H. Rollin Allen, (P-10113) 1565 City National Bank Bldg. Detroit, Michigan 48226

PLEASE TAKE NOTICE that MOTION TO QUASH SERVICE OF PROCESS will be heard by the Honorable John D. O'Hair, Wayne County Circuit Court, 18th floor, City-County Building, Detroit, Michigan, on FRIDAY, July 17, 1981, at the opening of Court, in the above-captioned matter.

Dated:
July 13, 1981

/s/ Virginia Cramer
In Propria Persona

MOTION TO QUASH SERVICE

Virginia Cramer, in propria persona, having filed a special and limited appearance in propria persona, moves the Court to quash service of the process of "Order to Show Cause" dated March 13, 1981, and to Order restitution of One Thousand ($1,000.00) Dollars cash to said Virginia Cramer, on the grounds that said service of process was invalid, and to dismiss the Amended Motion for Entry of An Order to Show Cause, for the following reasons:

1. That the so-called "Judgment for Plaintiff and Injunctive Order" entered on January 5, 1973, is invalid since it orders nothing; that the Court speaks only through its written "Orders."

2. That the Michigan Supreme Court decision and opinions of December 30, 1976, captioned State Bar of Michigan vs Cramer, reported at 399 Mich 116, and also the "Order of Remittitur" entered on January 20, 1977, affirmed the "Judgment" of January 5, 1973,

and which said Judgment for Plaintiff and Injunctive Order orders nothing.

3. That the Michigan Supreme Court did not remand the matter to the trial court and the Wayne County Circuit Court does not have jurisdiction to take further proceedings.

4. That the "Order to Show Cause" entered in the Wayne County Circuit Court on March 13, 1981, Civil Action No. 72-218-571-CZ, is invalid and service of process is invalid where without a remand by the Michigan Supreme Court the lower court has no jurisdiction.

5. That the "Warrant" issued on April 29, 1981, and executed on June 12, 1981, arresting the said Virginia Cramer, is invalid for the same reasons and grounds that the "Order to Show Cause" issued on March 13, 1981, and served upon Virginia Cramer is invalid where the Wayne County Circuit Court has no jurisdiction, without a remand by the Michigan Supreme Court.

6. That on said June 12, 1981, the said Judge John D. O'Hair illegally and unlawfully,

in the absence of jurisdiction without a remand by the Michigan Supreme Court, Ordered that Virginia Cramer post a $1,000.00 cash bond following said illegal and unlawful arrest.

7. That the said Judge John D. O'Hair flagrantly and maliciously robbed said Virginia Cramer of said One Thousand ($1,000) Dollars in cash, which is not a bond.

8. That the cash amount of $1,000. was paid by Virginia Cramer for her immediate release from the Wayne County Jail on the condition that she appear in the Wayne County Circuit Court on June 17, 1981, as stated by Judge John D. O'Hair.

9. That said Virginia Cramer appeared in propria persona in Judge John D. O'Hair's courtroom on said June 17, 1981, at approximately 9:00 A.M. and, by fraud and deceit, the date was changed to August 11, 1981, and for the reason that H. Rollin Allen did not have Subpeonas served, as misrepresented to the said Virginia Cramer.

10. That the invalid "Order to Show Cause" served and the illegal arrest of Virginia Cramer and robbing her of $1,000.00 are despicable, contemptible, dirty tactics.

WHEREFORE Virginia Cramer in propria persona prays that the Court grant her motion by special and limited appearance, to quash service of process of Order entered on March 13, 1981, and dismiss plaintiff's Amended Motion for Order to Show Cause, and Order restitution of One Thousand ($1,000.00) Dollars.

Dated:
July 13, 1981

/s/ Virginia Cramer
In Propria Persona

BRIEF IN SUPPORT OF MOTION
TO QUASH SERVICE AND TO DISMISS

A special and limited appearance of Virginia Cramer, in propria persona, filed herein is for the sole purpose of objecting to the jurisdiction of the Wayne County Circuit Court.

The Michigan Supreme Court's decision and opinions rendered on December 30, 1976, reported at 399 Mich 116, did not remand the matter to the lower court for further pro-

ceedings. Also, the order of remittitur entered by the Michigan Supreme Court Clerk, and/or as directed by that Court, did not remand the case or any matter to the lower court. If a case has not been remanded to the trial court after a decision by the Michigan Supreme Court, the trial court does not have jurisdiction to take further proceedings. Morris v Radley, (1943) 11 NW 2d 291, 306 Mich 689.

See copy of "remittitur" entered on January 20, 1977, in this case (attached hereto). Where the Michigan Supreme Court affirmed the "Judgment" of the trial court, and which said "Judgment and Injunctive Order" orders nothing, and there was nothing to re-instate the case in the lower court on remand, therefore, there was no remand. The Plaintiff-State Bar of Michigan did not request any "remand". Defendant-Cramer did not request any "remand". Without a "remand" the lower court has no jurisdiction. See 5B CJS Appeal and Error, at 1958. The word "remittitur" is used to denote the order issued by an

appellate court on the decision of a cause on appeal, directing the action to be taken or the disposition to be made of the cause by the lower court, as stated in Appeal and Error, 5B CJS at 1958, * * * "and it is now of the same nature as a discontinuance, and is governed by the same rules." (emphasis added)

The Wayne County Circuit Court was without jurisdiction to enter "Order to Show Cause" on February 19, 1981, and on March 13, 1981. The "Judgment and Injunctive Order" of the Wayne County Circuit Court, affirmed by the Michigan Supreme Court, is invalid and orders nothing. Therefore, there was nothing to remand.

July 13, 1981 /s/ Virginia Cramer
In Propria Persona

EXHIBIT B - Letter dated February 24, 1976

TO: Judge Richard D. Kuhn
Oakland County Circuit Court
1200 N. Telegraph Rd.
Pontiac, Michigan 48053

TO: Sheriff Johannes Spreen,
Oakland County Sheriff's Dept.
1201 N. Telegraph Rd.
Pontiac, Michigan 48053

TO: Prosecutor, Brooks Patterson
Oakland County
1200 N. Telegraph Rd.
Pontiac, Michigan 48053

In re: Invalid Bench Warrants signed by Judge Richard D. Kuhn against Virginia Cramer. Request to recall the same.

Dear Sirs:

This is a request that each of you take the proper and immediate action to recall the invalid bench warrants pending against Virginia Cramer, for the following reasons: On/or about April 4, 1975, the above-named Judge Richard D. Kuhn took illegal action against this writer, Virginia Cramer. Shortly thereafter, said Judge Kuhn illegally issued two (2) bench warrants against the said Virginia Cramer. Said bench warrants are invalid.

Subsequently, the Oakland County Sheriff's Dept. made three or four (perhaps more) attempts to arrest and incarcerate the said Virginia Cramer based upon the illegal action and invalid and improper issuance of said bench warrants on the part of Judge Richard D. Kuhn.

Recently, I checked with the Oakland County Sheriff's Dept. and I was given information that said illegal and invalid bench warrants against Virginia Cramer are still outstanding. This is shocking, to say the least in view of the grievances that were filed with the Michigan Judicial Tenure Commission against Judge Richard D. Kuhn. Judge Kuhn should have seen fit to recall the said invalid bench warrants, solely on the basis of propriety. Inasmuch as he has not yet recalled the said invalid warrants, it is now necessary for me to draw further attention to the illegal conduct of said Judge Kuhn, to various and several other persons, as shown in this letter. My concern is also based upon the potential of being

wrongfully arrested, detained, or imprisoned because of said invalid bench warrants illegally issued by said Judge Kuhn. If such unfortunate incident should occur, I would have no recourse except to institute a suit for false arrest and/or false imprisonment. It would, indeed, be unfortunate for others to become victimized by the negligence and illegal conduct of Judge Kuhn.

The law is very clear on this in Michigan. In De Kuyper vs. De Kuyper, 113 NW 2d 804, the Michigan Supreme Court held "a party cannot be subjected to jurisdiction of a court except by issuance (of summons) and service of process." In that case, the courts decision lent itself to the principle of the law, and in the absence of an amended complaint to allege facts relief upon to support the relief sought against one not a party to the suit, an ex parte order adding a party-defendant in the said proceedings, did not subject said 'party-defendant' to the court's jurisdiction.

As to the invalid bench warrants by Judge Kuhn against Virginia Cramer, the court records will show conclusively that (1) no party has amended any pleadings to add Virginia Cramer to any suit, (2) no party has alleged a cause of action against Virginia Cramer in Judge Kuhn's courtroom, (3) no summons was issued for service of process on Virginia Cramer, and (4) therefore, Judge Kuhn was without jurisdiction to sign said bench warrants and that Virginia Cramer has not voluntarily entered her appearance in any case before Judge Kuhn.

Yours truly,

/s/ Virginia Cramer

CC: Chief Justice Thomas G. Kavanagh
Justice G. Mennen Williams
Justice Charles L. Levin
Justice Mary S. Coleman
Justice John W. Fitzgerald
Justice Lawrence B. Lindemer
Justice James L. Ryan

EXHIBIT C - Letter dated October 5, 1981

Virginia Cramer
27314 Clairview Drive
Dearborn Heights, Michigan 48127

Re: The State Bar of Michigan
v.
Virginia Cramer, et al

Dear Ms. Cramer:

Enclosed please find a proposed Judgment which we intend to submit for entry by Judge O'Hair. If the proposed Judgment enclosed herewith is satisfactory, please approve for entry by signing above your typewritten name, and return in the enclosed self-addressed, stamped envelope. If I do not receive the proposed Judgment within seven (7) days from your receipt of same, I will then assume you do not approve the Judgment and I will bring the matter for hearing before Judge O'Hair.

Respectfully yours,

KIEFER, ALLEN, CAVANAGH & TOOHEY

/s/ H. Rollin Allen

EXHIBIT D - Proposed Judgment submitted by H. Rollin Allen - October 5, 1981

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

THE STATE BAR OF MICHIGAN, a Public Body Corporate, Plaintiff,
-vs-
VIRGINIA CRAMER, et al, Defendants.

HONORABLE JOHN D. O'HAIR

No. 72-218-571-CZ

JUDGMENT

At a session of said Court held in the City-County Building in the City of Detroit, Wayne County, Michigan, on _____

PRESENT: HONORABLE _____
Circuit Judge

WHEREAS a Judgment and Injunctive Order was entered by this Honorable Court on the 5th day of January, 1973 enjoining and restraining Defendant, Virginia Cramer, from the unauthorized practice of law; and

WHEREAS, a Motion and Amended Motion for Entry of an Order to Show Cause was filed, and an Order to Show Cause was issued on the 13th day of March, 1981, directing Defendant, Virginia Cramer, to appear and show cause why she

should not be punished for contempt for violating the Judgment and Injunctive Order entered January 5, 1973; and

Testimony was taken on Tuesday, August 11, 1981; and

The Court having had benefit of argument by Defendant and the Attorney for the State Bar of Michigan, Plaintiff,

NOW, THEREFORE, it is the finding of the Court that the Defendant, Virginia Cramer violated the Court's Order of January 5, 1973 as set forth in the Court's findings of that date, and she is in contempt of Court therefor.

IT IS FURTHER ORDERED that Defendant may purge herself of the contempt by total future abstention from the unauthorized practice of law, and more specifically from rendering counsel and service to persons seeking to dissolve a marital relationship in the Courts in the State of Michigan, and from furnishing forms with assistance as to their completion to individuals seeking to obtain any dissolution of marital relationship in the Courts in the State of Michigan.

IT IS FURTHER ORDERED that Defendant shall forthwith pay into the Wayne County Circuit Court the sum of Ninety Five Dollars ($95.00), which sum was charged William W. Neville.

IT IS FURTHER ORDERED that the Clerk of the Court shall forward Forty Five Dollars ($45.00) of that sum to William W. Neville at 5016 Orchard, Dearborn, Michigan.

IT IS FURTHER ORDERED that if, after August 11, 1981, the Defendant engages in the unauthorized practice of law in violation of the January 5, 1973 Order and is so adjudicated by this Court, she will be required to spend thirty (30) days in the Wayne County Jail.

IT IS FURTHER ORDERED that such thirty (30) days imprisonment will be imposed as a deterent to the further unauthorized practice of law and not as punishment.

IT IS FURTHER ORDERED that if Defendant, Virginia Cramer, does not pay the sum of Ninety Five Dollars ($95.00) to the Wayne County Clerk on or before August 16, 1981,

Defendant shall be committed to the Wayne County Jail.

NOT SIGNED

NOT ENTERED
NOT FILED

Circuit Judge

EXHIBIT E - Filed November 13, 1981

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION-DETROIT

VIRGINIA CRAMER,
Petitioner-Plaintiff
VS

Action No.
81-73926

THE STATE BAR OF MICHIGAN; JOHN D. O'HAIR; WILLIAM LEO CAHALAN; RICHARD D. KUHN; H. ROLLIN ALLEN; et al.
Respondents-Defendants.

Filed
11-13-81

State of Michigan)
County of Wayne) ss.

AFFIDAVIT OF WILLIAM W. NEVILLE

WILLIAM W. NEVILLE, being first duly sworn, on this 13th day of November, 1981, personally appeared before me a Notary Public, who made oath that he has read this Affidavit by him subscribed, knows the contents thereof and that the same is true of his own personal knowledge except as to those matters stated to

be upon information and belief and as to those matters he believes them to be true, as follows:

1. That he is the William W. Neville who was subpeonaed by H. Rollin Allen as the attorney for the State Bar of Michigan for proceedings held in the Wayne County Circuit Court, State of Michigan, before the Honorable John D. O'Hair on August 11, 1981.

2. That he appeared and gave testimony on said date of August 11, 1981, in the said proceedings before the said Honorable John D. O'Hair.

3. That he has read the transcript of the proceedings of August 11, 1981, before the Honorable John D. O'Hair as appears to be submitted and filed in the United States District Court Docket No. 81-73926 attached to the pleadings of H. Rollin Allen under date of October 30, 1981.

4. That pertinent herein is the Honorable John D. O'Hair's statement on pages 7 and 8 of the herein aforementioned transcript of August

11, 1981, as follows: (quotation)

> "She is also to forthwith pay into the Court, a sum of $95. That fee that she charged Mr. Neville for rendering service, immediately. The $45 will be immediately forwarded to the clerk by Mr. Neville. (sic, ????) If Mrs. Cramer appears in court in the initiation of State Bar proceedings, it is established and the court is satisfied that she has continued in her unauthorized activity, she will spend 30 days in the Wayne County Jail. * * *
>
> "She is on fair notice that she will spend time in jail, 30 days specifically, if she continues her activities. Thirty days of imprisonment is simply imposed as a deterrent not as punishment. She has the ability to stay out of jail if she wishes to do so.
>
> "Prepare a proposed order, Mr. Allen.
>
> "If the $95 is not paid within the five days as ordered, Mrs. Cramer is to be committed to the Wayne County Jail".
>
> (Proceedings concluded.)"

5. That your affiant herein noticed that the said herin described transcript of August 11, 1981, as submitted and attached to the copies of pleadings by H. Rollin Allen, omits the testimony of said William W. Neville, affiant herein.

6. That your affiant did not request any refund of any moneys as pertaining or relative to or involving this matter; that he does not

want any repayment or refund or reimbursement of any moneys pertaining or relative to or involving this matter.

7. That your affiant did not authorize anyone to request any refund to him of any moneys involving this matter.

8. That your affiant believes that the attorney-H. Rollin Allen has unduly imposed upon and harassed your affiant; that your affiant did not and has not engaged the services of H. Rollin Allen; and further, that no attorney, especially not H. Rollin Allen, has been authorized to represent the said William W. Neville, affiant herein.

/s/ WILLIAM W. NEVILLE, affiant
3045 Monroe
Dearborn, Michigan 48124

Short Jurat

Dated: November 13, 1981

EXHIBIT B-2

OAKLAND COUNTY CIRCUIT COURT - Judge Kuhn

Seaholm v Seaholm, No. 74-114-277-DO

Docket Entries

8-5-74 Complaint for Divorce, filed. Summons issued.

9-4-74 Defendant's (Terry Lee Seaholm) Appearance signed, notarized, filed.

11-8-74 Default and Affidavit of Default, filed. Proof of Service, filed.

2-17-75 Defendant-Terry Lee Seaholm's waiver (military) signed, filed.

2-17-75 Plaintiff-Linda Carol Seaholm's Praecipe, filed. Hearing date set for March 26, 1975.

2-17-75 Notice of hearing to Defendant, Proof of Service, filed.

3-26-75 Divorce granted. Default Judgment of Divorce dated March 26, 1975, signed by Judge Richard D. Kuhn.

4-4-75 Ex Parte Order to Show Cause against Virginia Cramer, issued, by Judge Kuhn. (no affidavit, no complaint, no summons, no motion, no notice of hearing) "Cramer" not served.

4-7-75 "Return" filed. (shows incorrect address for "Cramer" and no named-document as "served" on said "return")

4-9-75 Bench Warrant issued for "Cramer's" arrest, by Judge Richard D. Kuhn. Writ # 75-604 for failure to appear.

4-10-75 Seven (7) government vehicles dispatched, with an abundant personnel

(Oakland County Sheriff's deputies and Dearborn Heights city police and detectives) to execute said one (1) bench warrant issued for "Cramer's" arrest. (1 person)

4-10-75 Lien entered, for Statewide pick-up, on Bench Warrant for failure to appear as ordered by court; Misdemeanor Warrant for Failure to Appear - re: Virginia Cramer.

6-12-81 "Cramer" arrested and jailed June 12, 13, 14 and 15, 1981. Oakland County Jail.

6-15-81 "Cramer" forcibly brought into court-room handcuffed, shackled and chained, approx. 11 A.M. before Judge Kuhn.

6-15-81 "Cramer" not examined by Judge Kuhn, but, Cramer reminded Judge Kuhn that she had written him a letter, dated February 24, 1976.

6-15-81 "Cramer" taken back to Oakland County Jail, and released approx. 3 P.M. at rear of said jail.

6-15-81 Bench Warrant cancelled, entered June 19, 1981.

* *

Horn v Horn, No. 75-121954-DO

Docket Entries

2-25-75 Complaint for divorce, filed. Summons issued.

2-25-75 Defendant-Daniel Robert Horn served personally, by Oakland County Sheriff's Dept.

2-25-75 Sheriff's return of service, filed.

3-26-75 Default and Affidavit of Default, filed. Praecipe filed, Date set for April 30, 1975.

4-30-75 Divorce granted. Default Judgment of Divorce signed by Judge Kuhn.

5-8-75 Ex Parte Order to Show Cause against Virginia Cramer, issued by Judge Kuhn. (no affidavit, no complaint, no summons, no motion, and "Cramer" not served)

5-16-75 Sheriff's return shows not personally served upon Cramer.

5-16-75 Order for Substituted Service, issued by Judge Kuhn. Substituted service not completed. Mail not delivered and returned to Oakland County Clerk's office, undelivered.

7-24-75 Order for Bench Warrant issued for failure to "Cramer" to appear on May 21, 1975.

7-24-75 Lien entered, for Statewide pick-up. Misdemeanor Warrant for Contempt of Court, Bench Warrant/failed to appear.

6-12-81 "Cramer" arrested and jailed on June 12, 13, 14 and 15, 1981.

6-15-81 "Cramer" forcibly brought into Courtroom, chained, shackled and handcuffed approx. 11 A.M. before Judge Kuhn.

11-23-77 Bench Warrant cancelled by Judge Kihn, Writ # 75-1220, entered on June 19, 1981.

6-15-81 "Cramer" not examined by Judge Kuhn, but Cramer reminded Judge Kuhn as to her February 24, 1976 letter and

cited: DeKuyper v. DeKuyper, (Mich) 113 NW 2d 804. - no jurisdiction.

6-15-81 "Cramer" released at rear of said Oakland County Jail, approx. 3 P.M.

* *

EXHIBIT B-3

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY
OF OAKLAND

LINDA CAROL SEAHOLM, Plaintiff, No. 74-114-277 DO

v

TERRY LEE SEAHOLM, Defendant.

FILED Apr. 4, 1975

(EX PARTE) ORDER TO SHOW CAUSE

At a session of said Court, held in the Courthouse, City of Pontiac, County of Oakland, State of Michigan, on this 4th day of April, A.D. 1975

PRESENT: THE HONORABLE RICHARD D. KUHN, Circuit Judge

Linda Carol Seaholm having appeared In Propria Persona in the above entitled cause, and it appearing from her testimony under oath that Virginia M. Cramer has been engaged in the unauthorized practice of law,

IT IS HEREBY ORDERED that Virginia M.

Cramer appear before this Court on Wednesday April 9, 1975 at 2:30 in the afternoon, and show cause, if any she have, why she should not be punished for the contemptuous acts more fully described as follows:

The selling of legal advice to Linda Carol Seaholm in regard to the institution and prosecution of divorce proceedings against Terry Lee Seaholm. Said advice was first sold between July 27 and August 5, 1974, and continued on various subsequent occasions up to February of 1975.

Said advice consisted of the explanation of how to fill out forms, also sold by Virginia M. Cramer. Said forms constitute the majority, if not all, of the pleadings filed in the above entitled cause.

Additionally, Virginia M. Cramer's fee included advice on how to appear before this Court, what to say, how to serve papers, and where to file them.

IT IS FURTHER ORDERED that a true copy of the Order to Show Cause be personally served on Virginia M. Cramer on or before April 5, 1975.

/s/ Richard D. Kuhn
Circuit Judge

EXHIBIT B-4

STATE OF MICHIGAN)
COUNTY OF OAKLAND) Civil Division
No. 74-114277

I HEREBY CERTIFY AND RETURN, That on the 4th day of April A.D. 1975 at 27314 Clearview, Dearborn Hgts. in the State of Michigan, I served the attached _____ personally on Virginia Cramer _____ named in said _____ by then and there, at the place and on _____

_____

a true copy of said _____

Fees: - Service $____
Travel $____
Copies $____
Total $____

_____ Sheriff
By /s/ Cpl. Velat
Deputy Sheriff

NO FILING DATE

NOTE: In the above, no document named; no document served; wrong street name.

EXHIBIT B-5

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY
OF OAKLAND

LINDA CAROL SEAHOLM, Plaintiff,
vs.
TERRY LEE SEAHOLM, Defendant.

NO. 74-114277 DO

ISSUED
Apr 9, 1975

IN THE MATTER OF VIRGINIA M. CRAMER

ORDER FOR BENCH WARRANT

At a session of said court, held in the Courthouse, City of Pontiac, County of Oakland, State of Michigan, on this 9th day of April A.D. 1975

PRESENT: THE HONORABLE RICHARD D. KUHN, Circuit Judge

The Court having ordered on the 4th day of April, A.D. 1975, that Virginia M. Cramer appear before this Court on Wednesday, April 9, 1975 at 2:30 in the afternoon and show cause, if any she have, why she should not be punished for Contempt of Court;

The case having been called in open Court and the said Virginia M. Cramer having failed to appear as ordered;

The Court having noted that the Sheriff's

Return of Service was duly filed stating that Virginia M. Cramer was served with the Order to Show Cause on the 4th day of April, A.D. 1975;

IT IS HEREBY ORDERED that a Bench Warrant be issued by the Clerk of the Court commanding the arrest of the said Virginia M. Cramer and commanding that she be brought before this Court for disposition according to law.

/s/ Richard D. Kuhn,
Circuit Judge

Issued
Apr 9, 1975

EXHIBIT B-6

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY
OF OAKLAND

LINDA CAROL SEAHOLM,
Plaintiff,
v
TERRY LEE SEAHOLM,
Defendant.
/

NO. 74-114277 DO

WRIT # 75-604

FILED
Jun 19, 1981

IN THE MATTER OF VIRGINIA M. CRAMER/

ORDER FOR CANCELLATION OF BENCH WARRANT

At a session of said Court held in the Courthouse, in the City of Pontiac, County of Oakland, State of Michigan, on this 15th day of June A.D. 1981

PRESENT: THE HONORABLE RICHARD D. KUHN
CIRCUIT JUDGE

IT IS HEREBY ORDERED AND ADJUDGED that the Bench Warrant for the arrest of Virginia Carmer on April 9, 1975 be and the same is hereby cancelled.

/s/ Richard D. Kuhn

Circuit Judge

Filed
June 19, 1981

EXHIBIT B-7

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY
OF OAKLAND

DEBRA KAY HORN, Plaintiff, NO. 75-121954 DO

v

DANIEL ROBERT HORN, Defendant. FILED

May 9, 1975

IN THE MATTER OF VIRGINIA CRAMER

(EX PARTE) ORDER TO SHOW CAUSE

At a session of said Court, held in the Courthouse, City of Pontiac, County of Oakland, State of Michigan, on this 8th day of May, A.D. 1975

PRESENT: THE HONORABLE RICHARD D. KUHN, Circuit Judge

Debra Kaye Horn having appeared in Propria Persona in the above entitled cause, and it appearing from her testimony given under oath on April 30, 1975, that Virginia Cramer has been engaged in the unauthorized practice of law;

IT IS HEREBY ORDERED that Virginia Cramer appear before this Court on Wednesday, May 21, 1975 at 2:00 o'clock in the afternoon, and show cause, if any she have, why she should not be punished for the contemptuous acts more

fully described as follows:

The selling of legal advice to Debra KayeHorn in regard to the institution and prosecution of divorce proceedings in the Circuit Court for the County of Oakland, against Daniel Robert Horn. Said advice was sold over a period beginning on or about February 21, 1975 and continuing to on or about April 28, 1975. The fee for said advice was $55.00, which fee was paid on or about February 21, 1975. Said advice consisted of the explanation of what proceedings to go through to obtain a judgment of divorce in the Circuit Court for the County of Oakland. Additionally, for the fee charged, Virginia Cramer provided Debra Kaye Horn with a typed paper constituting the "litany" which Debra Kaye Horn should recite to put in proofs for her case. For the fee charged, Virginia Cramer also prepared all pleadings in the above entitled cause.

IT IS FURTHER ORDERED that a true copy of this Order to Show Cause be personally served

on Virginia Cramer on or before May 17, 1975.

/s/ Richard D. Kuhn

Filed
May 9, 1975

Circuit Judge

EXHIBIT B-8

RETURN ON SERVICE IF NOT FOUND

STATE OF MICHIGAN)
COUNTY OF OAKLAND) SS

FILED
MAY 16, 1975

I do hereby certify and return that after diligent search and inquiry I have been unable to find the within named Defendant Virginia Cramer will not answer door _____

---

in my bailiwick.

JOHANNES F. SPREEN, Sheriff

/s/ GUY E. KESSLER
Deputy Sheriff

Pontiac, Mich.

May 16, 1975

EXHIBIT B-9

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY
OF OAKLAND

DEBRA KAY HORN,
Plaintiff,

v

DANIEL ROBERT HORN,
Defendant.
_____/

NO. 75-121954 DO

FILED
June 3, 1975

IN THE MATTER OF VIRGINIA CRAMER

ORDER FOR SUBSTITUTED SERVICE

At a session of said Court, held in the Courthouse, City of Pontiac, County of Oakland, State of Michigan, on this 16th day of May, A.D. 1975

PRESENT: THE HONORABLE RICHARD D. KUHN
Circuit Judge

The Court being advised that diligent efforts to personally serve Virginia Cramer with the Order to Show Cause filed May 9, 1975, in this cause, have been in vain as appears from the Sheriff's return;

IT IS HEREBY ORDERED that service of said Order to Show Cause on Virginia Cramer may be had by posting a true copy of it, together with a true copy of this Order, on the front door of her residence located at 27314 Clair-

view, Dearborn Heights, Michigan 48127; and in addition by mailing of same to said residence by registered mail, return receipt requested.

/s/ Richard D. Kuhn
Circuit Judge

Entered
May 16, 1975

Filed June 3, 1975

A copy of this order served as directed on 5/16/75 at 6.55 PM attached to the front door.
Sheriff's Complaint #75-8368
Served by Cpl John F. Taylor
C.C.S.D.

/s/ John F. Taylor

NOTE: There was no registered mail and/or "return receipt" connected with the above.

EXHIBIT B-10

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY
OF OAKLAND

DEBRA KAYE HORN, Plaintiff NO. 75-121954 DO

VS

DANIEL ROBERT HORN, Defendant. FILED NO DATE

IN THE MATTER OF VIRGINIA CRAMER

ORDER FOR BENCH WARRANT

At a session of said Court, held in the Courthouse, in the City of Pontiac, County of Oakland, State of Michigan, on this 24th day of July, A.D. 1975

PRESENT: THE HONORABLE RICHARD D. KUHN
Circuit Judge

The Court having ordered on the 8th day of May, A.D. 1975, that Virginia Cramer appear before this Court on Wednesday, May 21, 1975 at 2:00 o'clock in the afternoon and show cause, if any she have, why whe should not be punished for Contempt of Court;

The Court having Ordered Substituted Service of the Order to Show Cause, due to the inability to obtain personal service, as is more fully shown by the file in this cause;

The file reflecting further that the Order for Substituted Service was complied with;

The case having been called in open Court on the day and date set for hearing, and the said Virginia Cramer having failed to appear;

IT IS HEREBY ORDERED that a Bench Warrant be issued by the Clerk of the Court commanding the arrest of the said Virginia Cramer and commanding that she be brought before this Court for disposition according to law.

/s/ Richard D. Kuhn
Circuit Judge

Date Filed: NONE

EXHIBIT B-11

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY
OF OAKLAND

DEBRA KAYE HORN,
Plaintiff,
v
DANIEL ROBERT HORN,
Defendant.

NO. 75-121954 DO
WRIT # 75-1220

FILED
Jun 19, 1981

IN THE MATTER OF VIRGINIA CRAMER

ORDER FOR CANCELLATION OF BENCH WARRANT

At a session of said Court held in the Courthouse, in the City of Pontiac, County of Oakland, State of Michigan, on this 23rd day of November, A.D. 1977

PRESENT: THE HONORABLE RICHARD D. KUHN
Circuit Judge

IT IS HEREBY ORDERED AND ADJUDGED that the Bench Warrant issued for the arrest of Virginia Cramer on July 24, 1975 be and the same is hereby cancelled.

/s/ Richard D. Kuhn
Circuit Judge

Issued: November 23, 1977

Filed: June 19, 1981

EXHIBIT BB

KIEFER, ALLEN & CAVANAGH
Attorneys & Counsellors
1565 City National Bldg.
(Penobscot Building)

Detroit 48226

March 13, 1981

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Ms. Rosetta Hadley

486 Ditmar

Pontiac, Michigan 48053

Dear Ms. Hadley:

Upon receipt of this letter, would you please contact the undersigned concerning problems connected with your Divorce Judgment?

Very truly yours,

KIEFER, ALLEN & CAVANAGH

HRA:md /s/ H. Rollin Allen

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